

CENTRE FOR INTERNATIONAL ECONOMICS

Corporate Privacy Policy

21 May 2019



www.TheCIE.com.au

Privacy

The Privacy Act 1988 (*Cth*) ("*Privacy Act*") defines personal information as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not ("*Personal Information*"). The Privacy Act imposes obligations on Centre for International Economics ("*CIE*", "we", "us" or "our") relating to the collection, storage, access, use and disclosure of Personal Information.

In general terms, Personal Information is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered Personal Information.

By providing your Personal Information to CIE you agree to our use and disclosure of your Personal Information in accordance with this privacy policy as varied from time to time, and as otherwise permitted under the Privacy Act.

By providing Personal Information to CIE about any other person, you agree that:

- you have made that person aware of the matters of which they are entitled to be made aware under the Privacy Act or the Privacy Principles contemplated by the Privacy Act;
- CIE may contact that person without notifying you; and
- CIE may disclose to that person your identity, and the fact that you have disclosed personal information about that person to CIE.

1. Means of collecting Personal Information

- CIE collects information directly from you, including by collecting information directly from you during your transactions with us;
- CIE collects information when you contact us by telephone, by email, through CIE events, complete CIE application forms, or enter into licensing, contracting or other arrangements with CIE, such as subcontractors and surveys on agreed projects
- We may obtain information from other sources, such as people or organisations involved in consulting and State, Territory and Commonwealth government departments and agencies, but only where it is unreasonable or impracticable to obtain the information from the individual concerned. We may obtain personal information from government departments and agencies when they have already collected and aggregated the personal information of a number of individual's as part of their responsibilities.

2. Types of Information that CIE collects and holds

CIE may collect the following Personal Information about you:

- your name;
- your mailing or street address;
- your email address;
- your telephone number;
- your facsimile number;
- your age or birth date; and
- your occupation or connection to anything the CIE has, is or may undertake.

3. Purpose of collection

CIE collects information during the normal course of business when providing services, such as reports, cost benefit analysis, research pieces, to individuals and to organisations as required.

4. Use of personal information

CIE may use the information it collects:

- for the purposes for which the information was collected as identified in paragraph 0;
- to contact and disseminate information on the economics industry to you;
- for purposes reasonably related to those set out in paragraph 0;
- for the administrative, marketing, planning, product or service development, quality control and research purposes;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

5. Disclosure of personal information

CIE may disclose personal information to:

- our employees, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- any organisation for any authorised purpose with your express consent;
- Commonwealth and State departments, and national and international bodies concerned with economic outcomes;

CIE's service providers and advisers (on a confidential basis and use of the information will be limited to the purpose of CIE's business only), including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants.

Where CIE discloses information, it will seek the recipient's agreement to treat that information in accordance with this privacy policy. If personal information pertaining to a third party is made available to you as a result of your relationship with CIE, you agree to:

- use that personal information for the purposes for which it was disclosed;
- protect it at all times against unauthorised disclosure; and
- otherwise treat third party personal information in accordance with this privacy policy.

6. Use and disclosure for other purposes

CIE may use and disclose information:

- for the prevention, investigation, prosecution of criminal offences or seriously improper conduct; or
- where the disclosure is required or authorised by or under applicable laws.

7. Storage of personal information overseas

We store any personal information that we collect in electronic format on servers located within Australia.

CIE has accounting software with MYOB, please see link below for their privacy statement – https://www.myob.com/au/privacy-policy.

8. Our website

Our privacy policy also applies to our website.

8.1 Security

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

8.2 Links

We provide links to websites outside of our website, as well as to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that websites and its privacy policy. Third party websites are responsible for informing you about their own privacy practices.

9. Information Security and data quality

CIE takes all reasonable technical and physical security measures to protect information from loss, unauthorised access, modification, disclosure or other misuse. We strive to ensure the security, integrity and privacy of personal information that you submit to us through our website. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. We endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

We may hold your information in either electronic or hard copy form. CIE will take all reasonable steps to destroy or permanently de-identify personal information it holds, if it considers that the information is no longer needed for its business purposes, to ensure that the information is not illegally accessible. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact CIE (*see details below*).

10. Accuracy of your information

CIE takes all reasonable steps to ensure that the information held by it is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact CIE (*see details below*) to request the correction of your personal information. We will consider if the information requires amendment. If we do not agree that there are grounds for an amendment, then we will add a note to the personal information stating that you disagree with it.

11. What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using that contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (*and in any event within the time required by the Privacy Act, if applicable*).

12. Sensitive Information

CIE does not generally collect any sensitive information as that term is used in the Privacy Act (information relating to racial or ethnic origin, membership of political bodies, religion or trade unions, sexual preferences or activities, criminal record, state of health or medical history). CIE will only collect sensitive personal information where required by law or where consent is given. Where any sensitive personal information is held by CIE that information will only be used and disclosed by CIE for the purposes for which it was provided. If CIE asks for sensitive personal information, CIE will explain that it is requesting the provision of such information.

Commercial Information

Most information collected by CIE is of a commercial rather than personal nature. That is, it may include the name of a business or company rather than an individual, and/or refer to the size and/or quality assurance practices of that business or company.

CIE publishes commercial financial information aggregated from a number of industry sources, often in our reports. CIE will maintain the confidentiality of any commercial information, subject to the terms of any applicable confidentiality agreement.

Notifiable Data Breaches

1. Eligible Data Breach

The *Privacy Amendment (Notifiable Data Breaches) Act 2017* (*the Amendment Act*) defines an 'eligible data breach' as unauthorised access or disclosure of information, or loss of information, that a reasonable person would conclude is likely to result in serious harm to any individuals to whom the information relates.

To determine whether access, disclosure or loss of information would likely result in serious harm to any of the individuals involved, we will consider factors such as:

- the kind of information;
- the sensitivity of the information;
- whether the information is protected by one or more security measures;
- if the information is protected by one or more security measures the likelihood it could be overcome;
- the kind of persons who could obtain the information;
- if a security technology or methodology was used in relation to the information and designed to make the information unintelligible or meaningless to persons who are not authorised to obtain the information;
- the likelihood that persons who obtained the information are likely to have the intention of causing harm to any of the individuals to whom the information relates in the form of circumventing the security technology or methodology; and
- the nature of the harm.

2. Suspected Eligible Data Breach

There may be reasonable grounds for us to suspect there has been a data breach and we will take all reasonable steps to carry out an assessment as soon as practicable (*and within 30 days after we become aware of the suspected breach*) as to whether the data breach is an eligible data breach.

3. Notification of Eligible Data Breach

If there are reasonable grounds for us to believe that there has been an eligible data breach, and no exception under the Assessment Act applies, then we will prepare a written statement including:

- a description of the eligible data breach;
- the kinds of information concerned; and
- recommendations about the steps that individuals should take in response to the eligible data breach.

If there is an eligible data breach of more than one entity, we will set out the details of those other entities in the manner described above.

We will provide this statement to the Office of the Australian Information Commissioner *(the Commissioner)* and *(if required by the Amendment Act)* we will then notify the contents of the statement to:

- each of the individuals to whom the relevant information relates; and
- individuals who are at significant risk from the eligible data breach.

If it is not practical to contact you in this way, we may publish the statement on our website.

4. Exceptions to an Eligible Data Breach

There are exceptions under the Amendment Act which may not require us to notify an individual/s of an eligible data breach. Examples include:

- where we have taken action before any serious harm occurs and, as a result of the action, a reasonable person would conclude the access or disclosure will not be likely to result in any serious harm;
- (*if information is lost*) where we have taken action before any unauthorised access or disclosure; or
- where the Commissioner has declared that we are not required to give any notification.

Variations to this privacy policy

CIE reserves the right to vary this CIE policy from time to time without notice to you. CIE will publish the revised privacy policy on the CIE website.

This privacy policy was last updated on 21 May 2019.

Further Information

For further information on CIE's privacy practices, or if you wish to access your personal information, have a complaint as you believe your privacy has been breached, or wish to update your details, please contact:

Derek Quirke Managing Director Centre for International Economics (ABN 11 705 723 812) Ph: 02 6245 7800 F: 02 6245 7888 E: cie@thecie.com.au